

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

CHRISTOPHER J. HADNAGY, an individual; and SOCIAL-ENGINEER LLC, a Pennsylvania limited liability company, Plaintiff(s),  
vs.  
JEFF MOSS, an individual, and DEF CON COMMUNICATIONS, INC., a Washington corporation, et al. Defendant(s).

Case # 2:23-cv-01345

**VERIFIED PETITION FOR  
PERMISSION TO PRACTICE  
IN THIS CASE ONLY BY  
ATTORNEY NOT ADMITTED  
TO THE BAR OF THIS COURT  
AND DESIGNATION OF  
LOCAL COUNSEL**

FILING FEE IS \$250.00

Matthew Mertens \_\_\_\_\_, Petitioner, respectfully represents to the Court:  
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of  
Perkins Coie LLP  
(firm name)

with offices at \_\_\_\_\_ 1120 NW Couch Street, Fl 10 \_\_\_\_\_,  
(street address)

Portland \_\_\_\_\_, Oregon \_\_\_\_\_, 97217 \_\_\_\_\_,  
(city) (state) (zip code)

(503) 727-2199 \_\_\_\_\_, MMertens@perkinscoie.com \_\_\_\_\_.  
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by  
Jeff Moss and Def Con Communications, Inc. to provide legal representation in connection with  
[client(s)]

the above-entitled case now pending before this Court.

3. That since December 23, 2014  
(date), Petitioner has been and presently is a member in good standing of the bar of the highest Court of the State of Oregon  
(state) where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or from the clerk of the supreme court or highest admitting court of each state, territory, or insular possession of the United States in which the applicant has been admitted to practice law certifying the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts of other States on the dates indicated for each, and that Petitioner is presently a member in good standing of the bars of said Courts.

Court	Date Admitted	Bar Number
Oregon Supreme Court	12/23/2014	146288
U.S. District Court District of Oregon	04/11/2016	
U.S. Bankruptcy Court District of Oregon	04/11/2016	
Georgia Supreme Court	07/21/2014	870320
U.S. District Court Middle District of Georgia	06/08/2022	
U.S. District Court Northern District of Georgia	07/19/2022	

5. That there are or have been no disciplinary proceedings instituted against petitioner, nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory or administrative body, or any resignation or termination in order to avoid disciplinary or disbarment proceedings, except as described in detail below:

None

1       6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give  
2 particulars if ever denied admission):

3 None

6       7. That Petitioner is a member of good standing in the following Bar Associations.

7 Oregon State Bar #146288  
8 Georgia State Bar #870320

10     8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2  
11 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
14     None			
15			
16			
17			
18			

19                     (If necessary, please attach a statement of additional applications)

20     9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the  
21 State of Nevada with respect to the law of this state governing the conduct of attorneys to the same  
22 extent as a member of the State Bar of Nevada.

23     10. Petitioner agrees to comply with the standards of professional conduct required of  
24 the members of the bar of this court.

25     11. Petitioner has disclosed in writing to the client that the applicant is not admitted to  
26 practice in this jurisdiction and that the client has consented to such representation.

27

28

That Petitioner respectfully prays that Petitioner be admitted to practice before this Court  
FOR THE PURPOSES OF THIS CASE ONLY.

STATE OF Oregon )  
COUNTY OF Multnomah )

Petitioner's signature

Oregon )

Matt Mertens, Petitioner, being first duly sworn, deposes and says:

That the foregoing statements are true.

Subscribed and sworn to before me this

23<sup>rd</sup> day of August, 2023

An official notary public seal for the state of Oregon, featuring a circular design with the words "STATE OF OREGON" at the top and "NOTARY PUBLIC" at the bottom, with the year "1859" in the center.

OFFICIAL STAMP

**SHANNON MARIE KIMMEL**

NOTARY PUBLIC - OREGON

COMMISSION NO. 1023899

MY COMMISSION EXPIRES APRIL 21, 2026

**DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO  
THE BAR OF THIS COURT AND CONSENT THERETO.**

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner believes it to be in the best interests of the client(s) to designate Robert Cassity,  
(name of local counsel)  
Attorney at Law, member of the State of Nevada and previously admitted to practice before the above-entitled Court as associate resident counsel in this action. The address and email address of said designated Nevada counsel is:

**9555 Hillwood Drive 2nd Floor**  
(street address)

Las Vegas, Nevada, 89134  
(city) (state) (zip code)  
(702) 669-4600, bcassity@hollandhart.com.  
(area code + telephone number) (Email address)

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes  
2 agreement and authorization for the designated resident admitted counsel to sign stipulations  
3 binding on all of us.

4

5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6

7 The undersigned party(ies) appoint(s) Robert Cassity as  
8 (name of local counsel)  
his/her/their Designated Resident Nevada Counsel in this case.

9

10 /s/ Jeff Moss  
(party's signature)

11

12 Jeff Moss  
(type or print party name, title)

13 /s/ Jeff Moss  
(party's signature)

14

15 Jeff Moss o/b/o Def Con Communications  
(type or print party name, title)

16

17 **CONSENT OF DESIGNEE**

18 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

19

20 /s/ Robert J. Cassity  
Designated Resident Nevada Counsel's signature

21 9779 bcassity@hollandhart.com  
Bar number Email address

22

23 APPROVED:

24 Dated: this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

25

26 UNITED STATES DISTRICT JUDGE

Oregon State Bar

## Certificate of Good Standing

State of Oregon        )  
                            )  
                            ) ss.  
County of Washington    )

I, Troy Wood, do hereby certify that I am Regulatory Counsel of the Oregon State Bar, and have access to the official files and records of the Oregon State Bar.

The official files and records of the Oregon State Bar indicate:

**MATTHEW MERTENS, BAR NO. 146288**

was admitted to practice law in the State of Oregon by Examination and became an active member of the Oregon State Bar on December 23, 2014.

There are no grievances or disciplinary proceedings presently pending against this member.

No disciplinary action has been taken against this member in the past by the Oregon Supreme Court or the Oregon Disciplinary Board.

Mr. Mertens is an Active member of the Oregon State Bar in good standing, licensed and entitled to practice law in all the courts of the State of Oregon.

DATED this 18<sup>th</sup> day of August, 2023.



Troy Wood  
Regulatory Counsel  
Oregon State Bar

\*This certificate expires 60 days from the date of issuance\*



*Lawyers Serving the Public and the Justice System*

**Mr. Matthew Joseph Mertens**

**Perkins Coie LLP**

**10th Floor**

**1120 NW Couch Street**

**Portland, OR 97209**

**UNITED STATES**

**CURRENT STATUS:**

**Active Member-Good Standing**

**DATE OF ADMISSION:**

**07/31/2014**

**BAR NUMBER:**

**870320**

**TODAY'S DATE:**

**08/18/2023**

The prerequisites for practicing law in the State of Georgia are as follows:

- Certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, highest court required to practice law in Georgia.
- Enrolled with the State Bar of Georgia, arm of the Supreme Court of Georgia.

This member is currently in “**good standing**” as termed and defined by **State Bar Rule 1-204**. The member is current in license fees and is not suspended or disbarred as of the date of this letter.

**STATE BAR OF GEORGIA**

A handwritten signature in black ink that reads "Anna Osgar".

**Official Representative of the State Bar of Georgia**

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**HEADQUARTERS**  
104 Marietta St. NW, Suite 100  
Atlanta, GA 30303-2743  
404-527-8700 · 800-334-6865  
Fax 404-527-8717  
[www.gabar.org](http://www.gabar.org)

**COASTAL GEORGIA OFFICE**  
18 E. Bay St.  
Savannah, GA 31401-9910  
912-239-9910 · 877-239-9910  
Fax 912-239-9970

**SOUTH GEORGIA OFFICE**  
244 E. 2nd St. (31794)  
P.O. Box 1390  
Tifton, GA 31793-1390  
229-387-0446 · 800-330-0446  
Fax 229-382-7435